



IDAHO DEPARTMENT  
OF HEALTH AND WELFARE

DIVISION OF  
ENVIRONMENTAL QUALITY

9512-144-2A

1410 North Hillon, Boise, ID 83706-1255, (208) 334-0502

Philip E. Salt, Governor

June 17, 1997

CERTIFIED MAIL #P 875 705 121

Jamie Griffin  
Regulatory Affairs Coordinator  
American Fine Foods  
P.O. Box 460  
Payette, Idaho 83661

RE: American Fine Foods (Payette) - #9512-144-2  
Amendment to Tier II Operating Permit (#075-00002)

Dear Mr. Griffin:

The Idaho Department of Health and Welfare, Division of Environmental Quality (DEQ) received American Fine Foods' Tier II Operating Permit (OP) application on December 12, 1995. On May 23, 1996, the application was determined to be complete. On April 18, 1997, a proposed Tier II OP was issued for public comment. The public comment period was from April 30, 1997, through May 30, 1997. No comments were received.

Based on review of your application, and state and federal rules and regulations, DEQ finds this project meets the provisions of IDAPA 16.01.01.400 (Rules for the Control of Air Pollution in Idaho). Therefore, enclosed is your Tier II OP (#075-00002) for the emission sources that exist at the facility. The amended permit supersedes the permit that was originally issued on September 23, 1996.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to the Idaho Department of Health and Welfare Rules, Title 5, Chapter 3, "Rules Governing Contested Case Proceedings and Declaratory Rulings," by filing a petition with the Hearings Coordinator, Department of Health and Welfare, Administrative Procedures Section, 450 West State Street - 10th Floor, Boise, Idaho 83720-5450, within thirty-five (35) days of the date of this decision.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Martin Bauer, Chief, Air Quality Permitting Bureau, at (208) 373-0502.

Sincerely,

Orville D. Green  
Assistant Administrator  
Air & Hazardous Waste

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Enclosure

cc: Boise Regional Office  
Source File  
COF

June 17, 1997

**MEMORANDUM**

**TO:** Orville D. Green, Assistant Administrator  
Air & Hazardous Waste

**FROM:** Martin Bauer, Chief *M. Bauer*  
Air Quality Permitting Bureau

**SUBJECT:** Issuance of Amendment to Tier II Operating Permit #075-00002 to  
American Fine Foods (Payette)

**PURPOSE**

The purpose of this memorandum is to satisfy the requirements of IDAPA 16.01.01 Sections 400 through 406 (Rules for the Control of Air Pollution in Idaho) for issuing Operating Permits.

**PROJECT DESCRIPTION**

This project is for the issuance of a Tier II Operating Permit (OP) for the American Fine Foods (AFF) facility located in Payette, Idaho, in order to establish the facility as a synthetic minor source while providing maximum operational flexibility. Emission point sources existing at the facility are as follows: two (2) boilers, four (4) drying ovens, and two (2) lacquer stacks. Fugitive emission sources found at the facility are uncaptured coating and solvent volatile organic compounds and hazardous air pollutants, and paved roads.

**SUMMARY OF EVENTS**

The Idaho Department of Health and Welfare, Division of Environmental Quality (DEQ) received American Fine Foods' Tier II Operating Permit (OP) application on December 12, 1995. On May 28, 1996, the application was determined to be complete. On April 18, 1997, a proposed Tier II OP was issued for public comment. The public comment period was from April 30, 1997, through May 30, 1997. No comments were received.

**RECOMMENDATIONS**

Based on the review of the Tier II Operating Permit application materials and of applicable State of Idaho and federal regulations concerning the permitting of air pollution sources, the Bureau staff recommends that American Fine Foods, located in Payette, Idaho, be issued a Tier II Operating Permit for the sources that exist at the facility. The \$600.00 Tier II permit application fee is not applicable for this project.

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cc: S. West, Boise Regional Office  
OP File Manual  
Source File  
COF

STATE OF IDAHO  
AIR POLLUTION  
OPERATING PERMIT

GENERAL INFORMATION

PERMIT NUMBER

075 - 00002

AQCR

063

CLASS

2

SIC

2032

ZONE

11

UTM COORDINATE (km)

505

4880

1. PERMITTEE

American Fine Foods

2. PROJECT

Tier II Operating Permit

3. ADDRESS

P.O. Box 460  
25 North 6<sup>th</sup> Street

TELEPHONE#

(208) 642-6397

COUNTY

Payette

4. CITY

Payette

STATE

Idaho

ZIP CODE

83661

5. PERSON TO CONTACT

Jamie Griffin

TITLE

Regulatory Affairs Coordinator

6. EXACT PLANT LOCATION

25 North 6<sup>th</sup> Street, Payette, Idaho

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Food Processing and Can Manufacturing

8. GENERAL CONDITIONS

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, Section 16.01.01.400 and pertains only to emissions of air contaminants which are regulated by the State of Idaho and to the sources specifically allowed to be operated by this permit.

THIS PERMIT HAS BEEN GRANTED ON THE BASIS OF DESIGN INFORMATION PRESENTED IN THE APPLICATION AND DEQ'S TECHNICAL ANALYSIS OF THE SUPPLIED INFORMATION. CHANGES IN DESIGN OR EQUIPMENT, THAT RESULT IN ANY CHANGE IN THE NATURE OR AMOUNT OF EMISSIONS, MAY BE A MODIFICATION. MODIFICATIONS ARE SUBJECT TO DEPARTMENT OF HEALTH AND WELFARE, IDAHO DIVISION OF ENVIRONMENTAL QUALITY (DEQ) REVIEW IN ACCORDANCE WITH Section 16.01.01.200 OF THE Rules for the Control of Air Pollution in Idaho.

*David D. Green*

ASSISTANT ADMINISTRATOR  
DIVISION OF ENVIRONMENTAL QUALITY

ISSUED JUNE 17, 1997

DATE

EXPIRES JUNE 17, 2002

DATE

## AIR POLLUTION OPERATING PERMIT

## PERMIT NUMBER

## PERMITTEE AND LOCATION

American Fine Foods  
Tier II Operating Permit  
Payette, Idaho

075 - 00002

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

## SOURCE

Can Manufacturing Plant

## 1. EMISSION LIMITS

1.1 Can Manufacturing Plant

Emissions of volatile organic compounds (VOCs) from the can manufacturing plant shall not exceed the corresponding emission rate limits listed in Appendix A.

Emissions of glycol ethers from the can manufacturing plant shall not exceed the corresponding emission rate limits listed in Appendix A.

## 2. OPERATING REQUIREMENTS

2.1 Production Rate Limit

Finished can unit production shall not exceed 1,440,000 units per day and 300,000,000 units per rolling twelve (12) month period. A can unit consists of 1 can body and 2.2 can ends.

2.2 VOC Content of Side Seam Coating

VOC content of the side seam coating shall not exceed sixty-five percent (65%) by weight.

2.3 VOC Content of End Coating

VOC content of the end coating shall not exceed seventy percent (70%) by weight.

2.4 Glycol Ethers Content of Side Seam Coating

Glycol ethers content of the side seam coating shall not exceed thirty-one percent (31%) by weight.

2.5 Usage of Coatings and Solvents

2.5.1 Coating usage shall not exceed 63.0 pounds (lb) glycol ethers per 1,000,000 cans produced on a rolling twelve (12) month summation.

2.5.2 Coating and sealant and process solvent usage shall not exceed 637 pounds (lb) of volatile organic compounds (VOCs) per 1,000,000 cans produced on a rolling twelve (12) month summation.

2.5.3 Volatile organic compounds (VOCs) emissions from solvent usage for the purpose of cleaning of End Lines 1, 2, and 3 shall not exceed twenty-eight (28) pounds per day (lb/day) and 400 pounds per year (lb/yr).

## 3. MONITORING AND RECORDKEEPING REQUIREMENTS

3.1 The Permittee shall record, in a monthly report, the following information:

3.1.1 Production

The Permittee shall monitor and record daily can production in terms of units per day.

ISSUED: JUNE 17, 1997  
EXPIRES: JUNE 17, 2002

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## AIR POLLUTION OPERATING PERMIT

## PERMITTEE AND LOCATION

American Fine Foods  
Tier II Operating Permit  
Payette, Idaho

## PERMIT NUMBER

075 - 00002

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

## SOURCE

Can Manufacturing Plant

3.1.2 Coating and Solvent Usage

The Permittee shall monitor and record monthly the amount, in gallons, of coating and solvent consumed. Solvent usage for the purpose of end line cleaning maintenance shall be monitored and recorded daily upon use in either gallons per day or pounds per day (lb/day).

3.1.3 Volatile Organic Compounds (VOCs) and Glycol Ethers

The Permittee shall monitor and record, when received, the weight percent of volatile organic compounds (VOCs) and glycol ethers in the solvents and coatings.

- 3.2 The report required by Section 3.1 of this permit shall be maintained on file by the Permittee for the most recent five (5) year period and made available to DEQ representatives upon request.

ISSUED: JUNE 17, 1997  
EXPIRES: JUNE 17, 2002

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## AIR POLLUTION OPERATING PERMIT

P E R M I T N U M B E R

## PERMITTEE AND LOCATION

American Fine Foods  
Tier II Operating Permit  
Payette, Idaho

075 - 00002

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

## SOURCE

Can Manufacturing Plant

## APPENDIX A

## AMERICAN FINE FOODS - PAYETTE

EMISSION LIMITS<sup>a</sup> -- DAILY (lb/day) AND ANNUAL (T/yr)

EMISSION UNIT DESCRIPTION	Glycol Ethers		VOCs	
	lb/day	T/yr	lb/day	T/yr
Can Manufacturing Plant	90.7	9.5	954	95.7

- a As determined by a pollutant specific promulgated U.S. EPA method, or DEQ approved alternative, or as determined by DEQ's emission estimation methods used in this permit analysis.

ISSUED: JUNE 17, 1997  
EXPIRES: JUNE 17, 2002

AMF-111 permit amerff-111

OPERATING PERMIT GENERAL PROVISIONS

- A. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code 39-101 et. seq.
- B. The Permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- C. The Permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- 1) To enter upon the Permittee's premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
  - 2) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emission testing (i.e., performance tests) in conformance with state approved or accepted EPA procedures when deemed appropriate by the Director.
- D. Except for data determined to be confidential under Section 19-111, Idaho Code, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Division of Environmental Quality.
- E. Nothing in this permit is intended to relieve or exempt the Permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- F. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the Permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- G. This permit shall be renewable on the expiration date, provided the Permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.
- H. The Director may require the Permittee to develop a list of Operation and Maintenance Procedures which must be approved by DEQ. Such list of procedures shall become a part of this permit by reference, and the Permittee shall adhere to all of the operation and maintenance procedures contained therein.

ISSUED: JUNE 17, 1997  
EXPIRES: JUNE 17, 2002

NO. 075-00002 permit-amerrif-f.00

- I. Performance tests (i.e.; air emission source tests) conducted pursuant to testing requirements in this permit must be conducted in accordance with DEQ's **Procedures Manual for Air Pollution Control**. Such testing shall not be conducted on weekends or state holidays unless the Permittee obtains prior DEQ approval.

The Permittee shall submit a test protocol and a proposed test date for each performance test required by this permit to DEQ for approval at least thirty (30) days prior to each respective test date (including each test date for periodic tests such as, for example, annual tests). The Permittee shall promptly notify DEQ of any change in the proposed test date and shall provide at least five (5) working days advanced notice prior to conducting any rescheduled test, unless DEQ approves a shorter notice period.

Within forty-five (45) days of the date on which a performance test required by this permit is concluded, the Permittee shall submit to DEQ a performance test report for the respective test. The performance test report shall include any and all process operating data required to be recorded during the test period as well as the test results, raw test data, and associated documentation.

The maximum allowable source operating rate shall be limited to 120% of the average operating rate attained during the most recent performance test conducted pursuant to this permit which demonstrated compliance with the respective pollutant emission limit unless; (1) a more restrictive operating limit is specified elsewhere in this permit or; (2) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.

- J. The provisions of this permit are severable; and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

ISSUED: JUNE 17, 1997  
EXPIRES: JUNE 17, 2002

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